

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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GARY D. ARONSON,	:	
	:	
Plaintiff,	:	
	:	Civ. A. No. 1:11-CV-11492-NMG
v.	:	
	:	
ADVANCED CELL TECHNOLOGY, INC., ET AL.,	:	
	:	
Defendants.	:	
-----	X	
-----	X	
JOHN S. GORTON, AS TRUSTEE OF THE	:	
JOHN S. GORTON SEPARATE PROPERTY	:	
TRUST, DATED 3/3/1993,	:	
	:	Civ. A. No. 1:11-CV-11515-NMG
Plaintiff,	:	
	:	
v.	:	
	:	
ADVANCED CELL TECHNOLOGY, INC., ET AL.,	:	
	:	
Defendants.	:	
-----	X	

**MOTION FOR CONSOLIDATION**

Defendant, Advanced Cell Technology, Inc., pursuant to Fed. R. Civ. P. 42 and through its undersigned counsel, respectfully requests that the above-styled actions be consolidated for all purposes. Co-Defendant Wilmington Trust, N.A., the Administrator with Will Annexed of the Estate of William Mackay Caldwell, IV, Deceased, supports the requested consolidation.

The bases for this Motion are set forth in the Memorandum of Law, which is filed herewith.

Dated: March 16, 2012

Respectfully submitted,

/s/ Benjamin L. Mack

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*Counsel for Advanced Cell Technology, Inc.*

**CERTIFICATION PURSUANT TO LOCAL RULE 7.1**

I hereby certify that counsel for Defendant Advanced Cell Technology, Inc. conferred with counsel for Plaintiffs and Co-Defendant, Wilmington Trust, N.A., the Administrator with Will Annexed of the Estate of William Mackay Caldwell, IV, Deceased concerning the subject matter of this motion. Co-Defendant supports the relief sought herein. Plaintiffs' counsel was contacted about the matter first on March 7, 2012, and then again on March 12, 2012, but has not responded substantively to date.

Dated: March 16, 2012

/s/ Benjamin L. Mack

**CERTIFICATE OF SERVICE**

I hereby certify that, on March 16, 2012, this document (filed through the ECF system) will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

Dated: March 16, 2012

/s/ Benjamin L. Mack